

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

05/06/04 P 2:29

DIRECT REPORT CORPORATION d/b/a
SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, JOHN DOES 1
THROUGH 5, and JANE DOES 1
THROUGH 5,

Defendants.

Civil Action No. 04-10535 PBS

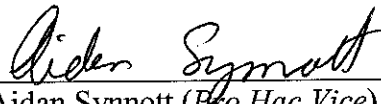
**DEFENDANTS CCBN.COM, INC. AND THE THOMSON
CORPORATION'S MOTION TO DISMISS PLAINTIFF'S
COMPLAINT AND TO STAY DISCOVERY**

Defendants CCBN.com, Inc. and The Thomson Corporation (together, the "Defendants") hereby move pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure to dismiss Counts 1-5 of the Complaint filed by Direct Report Corporation, doing business as Shareholder.com, in this action. Defendants also move to dismiss the remaining Counts 6-10 of the Complaint for lack of jurisdiction. Further, Defendants move to dismiss the complaint, in its entirety, as to The Thomson Corporation. Lastly, Defendants move to stay discovery in this action pending the resolution of this Motion to Dismiss.

WHEREFORE, Defendants respectfully request that this Court dismiss Plaintiff's Complaint; and

WHEREFORE, Defendants respectfully request that this Court stay discovery in this action pending the resolution of this Motion to Dismiss.

Respectfully Submitted,



Aidan Synnott (*Pro Hac Vice*)

H. Seiji Newman (*Pro Hac Vice*)

Sunny S. Park (*Pro Hac Vice*)

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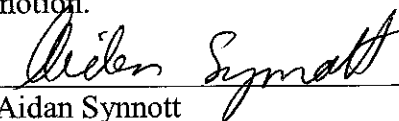
(617) 570-1000

Attorneys for Defendants CCBN.com, Inc.
and The Thomson Corporation

Dated: May 5, 2004

LOCAL RULE 7.1(a)(2) CERTIFICATE

I, Aidan Synnott, hereby certify that I have conferred with opposing counsel in good faith to resolve or narrow the issues raised in this foregoing motion.



Aidan Synnott

PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP

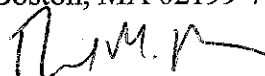
1285 Avenue of the Americas

New York, NY 10019-6064

(212) 373-3000

CERTIFICATE OF SERVICE

This is to certify that on this 6th day of May 2004, a true and correct copy of the above and foregoing instrument was served via hand delivery to Ruth T. Dowling, Esq., Palmer & Dodge LLP, 111 Huntington Avenue at Prudential Center, Boston, MA 02199-7613.



David M. Moss